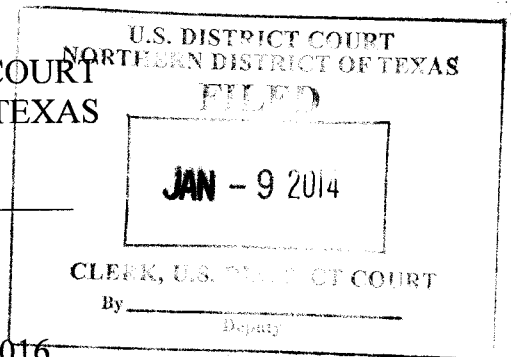


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

§

§

v.

§

No. 4:14-MJ-016

§

CHARLES LEON FOWLER

§

**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about January 09, 2014, the defendant, **Charles Leon Fowler**, in the Northern District of Texas, knowingly possessed matter, specifically a Western Digital External Hard Drive, SN WCC1U3001842, which contains any visual depiction that was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a prepubescent minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of 18 U.S.C. § 2252(a)(4)(B).

I further state I am a Special Agent with U.S. Immigration and Customs Enforcement and that this complaint is based on the following facts gathered by me through reports relayed to me by Detective Jeremy Cox with the Sherman, Texas Police Department and through my own investigation:

**INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE). I have been employed with ICE and its predecessor agency, the Immigration and Naturalization Service (INS), since June 1994.

As part of my duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A. I have experience conducting criminal investigations concerning internet crimes against children and training in undercover online internet investigations. This affidavit is based upon my personal investigation and on information obtained from other law enforcement officers assisting with this investigation.

**PROBABLE CAUSE**

2. On January 09, 2014, I received information that establishes probable cause to believe **Charles Leon Fowler** knowingly possessed matter, specifically a Western Digital External Hard Drive, SN WCC1U3001842, that contained visual depictions of minors engaged in sexually explicit conduct and that was produced using materials that had been mailed, transported, and shipped using any means and facility of interstate and foreign commerce in violation of 18 U.S.C. § 2252(a)(4)(B).

3. On August 30, 2013, while acting in an undercover capacity and using a computer connected to the Internet, Detective Jeremy Cox of the Sherman, Texas Police Department launched a publicly available file-sharing program.

4. While using the file-sharing program, Detective Cox connected to a computer on the ARES network using IP address 75.142.168.61 and received a list of files to download. Detective Cox then downloaded three video files that he described as appearing to be child pornography.

5. I was able to determine that the subscriber assigned to IP address 75.142.168.61 on August 30, 2013 was Charles "Flower" at the address 4720 Vance Road, North Richland Hills, Texas, which is located in the Fort Worth Division of the Northern District of Texas. I determined by using publicly available databases that **Charles Fowler**, not Flower, resided at 4720 Vance Road, North Richland Hills, Texas. Two other individuals appeared to also live at the home, K.L and L.L.

6. On January 09, 2013, I executed a search warrant at that residence located at 4720 Vance Road. I interviewed K.L. and L.L. who advised that **Fowler** did live at the residence but appeared to have spent the night at his sister's home. I then interviewed **Fowler** at his sister's residence also located in North Richland Hills; **Fowler** admitted to using the ARES file sharing program at the Vance Road address to search for and download files containing child pornography. **Fowler** said that he had been in possession of child pornography for at least two years.

7. Among items seized from **Fowler** was a Western Digital External Hard Drive taken from his bedroom, which was found to contain at least 80 files of suspected child pornography.

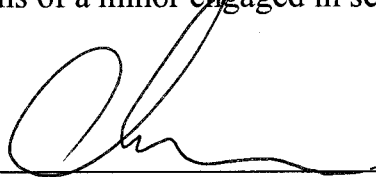
8. I viewed several files found on the Western Digital External Hard Drive and believe they are visual depictions of real minors engaged in sexually explicit conduct. Two of those images, which involve prepubescent minors, are described as follows:

File Name	File Description
#25nina thai de 10 anos	This 9-minute, 29-second video depicts a prepubescent female, age 8-10, nude on a bed. The minor female's vagina is being penetrated by an adult male's penis.
2010 susan & dad suck and fuck rare	This 5-minute, 2-second video depicts a prepubescent female, age 9-11, nude on a bed. She is performing oral sex on an adult male, after which she is penetrated vaginally by the male's penis.

9. The Western Digital Drive reflects that it was produced in Thailand and therefore is matter that was mailed, shipped and transported in interstate and foreign commerce.

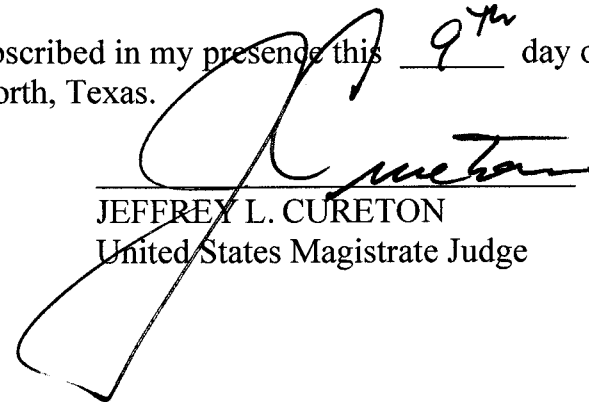
**CONCLUSION**

10. Based upon the foregoing facts and circumstances, I believe probable cause exists to find that **Charles Leon Fowler** has knowingly committed a violation of 18 U.S.C. § 2252(a)(4)(B), possession of visual depictions of a minor engaged in sexually explicit conduct.



Mike Jester  
Special Agent  
Department of Homeland Security  
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence this 9<sup>th</sup> day of January, 2014, at 2:10 p.m. in Fort Worth, Texas.



JEFFREY L. CURETON  
United States Magistrate Judge